

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DENNIS GROMOV, on behalf of himself
and all others similarly situated,

Plaintiff,

Case No. 1:22-cv-06918

v.

BELKIN INTERNATIONAL, INC.,

Defendant.

_____ /

PLAINTIFF'S NOTICE OF INTENT TO SERVE RULE 45 DOCUMENT SUBPOENAS

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the Plaintiff gives notice pursuant to Fed. R. Civ. P. 45 that Plaintiff intends to serve the enclosed document subpoenas on Amazon.com, Inc., Walmart Inc., Target Corporation, The ODP Corporation, and Best Buy Co., Inc.

Date: August 24, 2023

/s/ Jason A. Ibey
Jason A. Ibey
(Ill. Bar No. 16691)
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St. George, UT 84790
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William F. Cash III (Ill. Bar No. 6330856)
Matthew D. Schultz (*pro hac vice*)
Scott Warrick (*pro hac vice*)
**LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGEY, P.A.**
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D. Greg Blankinship (*pro hac vice*)
William S. Terrell (*pro hac vice*)
**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**
445 Hamilton Ave, Suite 605
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Phone: 914-298-3290
Email: gblankinship@fbfglaw.com
Attorneys for Dennis Gromov

CERTIFICATE OF SERVICE

I certify that this PLAINTIFF'S NOTICE OF INTENT TO SERVE RULE 45 DOCUMENT SUBPOENAS will be served on Belkin, today, August 24, 2023 by e-mail with Belkin's consent, pursuant to an e-service agreement for this matter, on the following:

Patricia Mathy (Patricia.Mathy@bakermckenzie.com)

Nancy Sims (Nancy.Sims@bakermckenzie.com)

Edward Totino (Edward.Totino@bakermckenzie.com)

Counsel for Defendant, Belkin International, Inc.

/s/ Jason A. Ibey

Jason A. Ibey

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

Dennis Gromov

Plaintiff

v.

Belkin International, Inc.

Defendant

Civil Action No. 1:22-cv-06918

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: AMAZON.COM, INC.

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1.

Place: Veritext - Seattle, WA
1200 Sixth Avenue, Suite 610
Seattle, WA 98101

Date and Time:

09/22/2023 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/24/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Jason A. Ibey

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Dennis Gromov, who issues or requests this subpoena, are:

Jason A. Ibey, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626; jason@kazlg.com; 800-400-6808

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:22-cv-06918

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT 1

Document Request No. 1:

For each Power Bank you sold in Illinois for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Illinois" means Power Banks that were delivered to an address in Illinois.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphe Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 2:

For each Power Bank you sold in Florida for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Florida" means Power Banks that were delivered to an address in Florida.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 3:

For each Power Bank you sold in Massachusetts for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Massachusetts" means Power Banks that were delivered to an address in Massachusetts.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 4:

For each Power Bank you sold in Missouri for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Missouri" means Power Banks that were delivered to an address in Missouri.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 5:

For each Power Bank you sold in New Jersey for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New Jersey" means Power Banks that were delivered to an address in New Jersey.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 6:

For each Power Bank you sold in New York for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New York" means Power Banks that were delivered to an address in New York.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphe Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 7:

For each Power Bank you sold in North Carolina for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in North Carolina" means Power Banks that were delivered to an address in North Carolina.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 8:

For each Power Bank you sold in Ohio for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Ohio" means Power Banks that were delivered to an address in Ohio.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 9:

For each Power Bank you sold in Washington for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Washington" means Power Banks that were delivered to an address in Washington.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 10:

For each Power Bank you sold in Wisconsin for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Wisconsin" means Power Banks that were delivered to an address in Wisconsin.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

Dennis Gromov

Plaintiff

v.

Belkin International, Inc.

Defendant

Civil Action No. 1:22-cv-06918

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: BEST BUY CO. INC.

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1.

Place: Veritext - Minneapolis, MN
150 S. Fifth Street, Suite
1775 Minneapolis, MN 55402

Date and Time:

09/22/2023 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/24/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Jason A. Ibey

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Dennis Gromov, who issues or requests this subpoena, are:

Jason A. Ibey, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626; jason@kazlg.com; 800-400-6808

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:22-cv-06918

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT 1

Document Request No. 1:

For each Power Bank you sold in Illinois for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Illinois" means Power Banks that were delivered to an address in Illinois.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 2:

For each Power Bank you sold in Florida for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Florida" means Power Banks that were delivered to an address in Florida.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 3:

For each Power Bank you sold in Massachusetts for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Massachusetts" means Power Banks that were delivered to an address in Massachusetts.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 4:

For each Power Bank you sold in Missouri for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Missouri" means Power Banks that were delivered to an address in Missouri.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 5:

For each Power Bank you sold in New Jersey for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New Jersey" means Power Banks that were delivered to an address in New Jersey.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 6:

For each Power Bank you sold in New York for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New York" means Power Banks that were delivered to an address in New York.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 7:

For each Power Bank you sold in North Carolina for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in North Carolina" means Power Banks that were delivered to an address in North Carolina.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 8:

For each Power Bank you sold in Ohio for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Ohio" means Power Banks that were delivered to an address in Ohio.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 9:

For each Power Bank you sold in Washington for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Washington" means Power Banks that were delivered to an address in Washington.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 10:

For each Power Bank you sold in Wisconsin for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Wisconsin" means Power Banks that were delivered to an address in Wisconsin.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

Dennis Gromov

Plaintiff

v.

Belkin International, Inc.

Defendant

Civil Action No. 1:22-cv-06918

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: TARGET CORPORATION

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1.

Place: Veritext - Minneapolis, MN
150 S. Fifth Street, Suite 1775
Minneapolis, MN 55402

Date and Time:

09/22/2023 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/24/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Jason A. Ibey

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Dennis Gromov, who issues or requests this subpoena, are:

Jason A. Ibey, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626; jason@kazlg.com; 800-400-6808

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:22-cv-06918

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT 1

Document Request No. 1:

For each Power Bank you sold in Illinois for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Illinois" means Power Banks that were delivered to an address in Illinois.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphey Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 2:

For each Power Bank you sold in Florida for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Florida" means Power Banks that were delivered to an address in Florida.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 3:

For each Power Bank you sold in Massachusetts for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Massachusetts" means Power Banks that were delivered to an address in Massachusetts.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 4:

For each Power Bank you sold in Missouri for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Missouri" means Power Banks that were delivered to an address in Missouri.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 5:

For each Power Bank you sold in New Jersey for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New Jersey" means Power Banks that were delivered to an address in New Jersey.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 6:

For each Power Bank you sold in New York for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New York" means Power Banks that were delivered to an address in New York.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphe Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 7:

For each Power Bank you sold in North Carolina for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in North Carolina" means Power Banks that were delivered to an address in North Carolina.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 8:

For each Power Bank you sold in Ohio for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Ohio" means Power Banks that were delivered to an address in Ohio.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 9:

For each Power Bank you sold in Washington for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Washington" means Power Banks that were delivered to an address in Washington.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 10:

For each Power Bank you sold in Wisconsin for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Wisconsin" means Power Banks that were delivered to an address in Wisconsin.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

Dennis Gromov

Plaintiff

v.

Belkin International, Inc.

Defendant

Civil Action No. 1:22-cv-06918

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: THE ODP CORPORATION

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1.

Place: Veritext - Miami, FL
2 S Biscayne Blvd., Suite 2250
Miami, FL 33131

Date and Time:

09/22/2023 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/24/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Jason A. Ibey

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Dennis Gromov, who issues or requests this subpoena, are:

Jason A. Ibey, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626; jason@kazlg.com; 800-400-6808

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:22-cv-06918

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT 1

Document Request No. 1:

For each Power Bank you sold in Illinois for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Illinois" means Power Banks that were delivered to an address in Illinois.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 2:

For each Power Bank you sold in Florida for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Florida" means Power Banks that were delivered to an address in Florida.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 3:

For each Power Bank you sold in Massachusetts for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Massachusetts" means Power Banks that were delivered to an address in Massachusetts.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 4:

For each Power Bank you sold in Missouri for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Missouri" means Power Banks that were delivered to an address in Missouri.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphe Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 5:

For each Power Bank you sold in New Jersey for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New Jersey" means Power Banks that were delivered to an address in New Jersey.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 6:

For each Power Bank you sold in New York for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New York" means Power Banks that were delivered to an address in New York.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 7:

For each Power Bank you sold in North Carolina for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in North Carolina" means Power Banks that were delivered to an address in North Carolina.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 8:

For each Power Bank you sold in Ohio for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Ohio" means Power Banks that were delivered to an address in Ohio.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 9:

For each Power Bank you sold in Washington for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Washington" means Power Banks that were delivered to an address in Washington.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 10:

For each Power Bank you sold in Wisconsin for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Wisconsin" means Power Banks that were delivered to an address in Wisconsin.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

Dennis Gromov

Plaintiff

v.

Belkin International, Inc.

Defendant

Civil Action No. 1:22-cv-06918

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: WALMART, INC.

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1.

Place: Arkansas Realtime Reporting LLC
1130 Millsap Road
Fayetteville, AR 72703

Date and Time:

09/22/2023 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/24/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Jason A. Ibey

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Dennis Gromov, who issues or requests this subpoena, are:

Jason A. Ibey, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626; jason@kazlg.com; 800-400-6808

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:22-cv-06918

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

ATTACHMENT 1

Document Request No. 1:

For each Power Bank you sold in Illinois for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Illinois" means Power Banks that were delivered to an address in Illinois.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphey Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 2:

For each Power Bank you sold in Florida for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Florida" means Power Banks that were delivered to an address in Florida.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 3:

For each Power Bank you sold in Massachusetts for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Massachusetts" means Power Banks that were delivered to an address in Massachusetts.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 4:

For each Power Bank you sold in Missouri for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Missouri" means Power Banks that were delivered to an address in Missouri.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphe Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 5:

For each Power Bank you sold in New Jersey for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New Jersey" means Power Banks that were delivered to an address in New Jersey.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 6:

For each Power Bank you sold in New York for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in New York" means Power Banks that were delivered to an address in New York.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Morphe Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 7:

For each Power Bank you sold in North Carolina for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in North Carolina" means Power Banks that were delivered to an address in North Carolina.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 8:

For each Power Bank you sold in Ohio for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Ohio" means Power Banks that were delivered to an address in Ohio.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 9:

For each Power Bank you sold in Washington for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Washington" means Power Banks that were delivered to an address in Washington.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.

Document Request No. 10:

For each Power Bank you sold in Wisconsin for the period December 9, 2018 through the present, please produce data or documents sufficient to identify the following: (1) Date of sale; (2) Price customer paid, excluding tax, delivery charges, or other fees or charges other than the purchase price; (3) Brand; (4) Model Number; (5) Stock-Keeping Unit; (6) City and state to which the Power Bank was shipped; (7) MilliAmpere hours (mAh) stated in specifications and labels; (8) Voltage stated in specifications and labels; (9) Connector type (e.g., Micro USB); (10) Weight of the device (excluding cables, cords, or other accessories). All data shall be produced in the form it is usually maintained in or a reasonable usable form, i.e., a form that is electronically searchable and sortable.

"Sold in Wisconsin" means Power Banks that were delivered to an address in Wisconsin.

For purposes of this request, the term "Power Bank" includes:

Belkin Portable Power Bank Charger 5K; Belkin Portable Power Bank Charger 10K; Belkin Portable Power Bank Charger 20K; Belkin Boost Charge Power Bank 5K; Belkin Boost Charge Power Bank 10K; Belkin Boost Charge Power Bank 20K; Belkin Pocket Power 5K Power Bank; Belkin Pocket Power 10K Power Bank; Belkin Boost Charge Magnetic Wireless Power Bank 2.5K; Belkin Boost Charge Power Bank 2K; Anker PowerCore 5000; Anker PowerCore 10000; Anker PowerCore 13000; Anker PowerCore 20000; Anker PowerCore 20100; Anker PowerCore 26800; Anker PowerCore II 10000; Anker PowerCore II 20000; Anker PowerCore III 10K Wireless; Anker PowerCore III Sense 10K; Anker PowerCore III 19K; Anker PowerCore III Elite 25600; Anker PowerCore Essential 20000; Anker PowerCore Slim 10000; Anker PowerCore+ 26800; Heyday 4000mAh Powerbank; Heyday 6000mAh Powerbank; Heyday 8000mAh Powerbank; Heyday 10000mAh Powerbank; Heyday 20000mAh Powerbank; Mophie Powerstation plus; Mophie Power boost; Mophie Powerstation XL; Mophie Powerstation; Mophie Powerstation PD; Mophie Powerstation mini; Mophie Powerstation pro; Mophie Power boost XL; Mophie Powerstation XXL; Mophie Powerstation plus XL; Mophie Power boost XXL; Mophie Powerstation plus mini; Mophie Powerstation plus mini; Mophie Powerstation plus XL; Miady 5000mAh Portable Charger; Miady 10000mAh Portable Charger; Miady 15000 mAh Portable Charger; Miady 20000mAh Portable Charger; Miady 26800mAh Portable Charger; Tzumi PocketJuice Endurance AC 12K; Tzumi 20000 MAh; Tzumi PocketJuice Endurance AC 10K; Tzumi PocketJuice Endurance AC 12K; Tzumi PocketJuice Endurance AC 6K; Tzumi PocketJuice Endurance AC 8K; Samsung 10000Mah Portable Charger Battery Pack; Samsung Battery Pack 10000mAh; Samsung Battery Pack 2200mAh; Samsung Battery Pack 5100mAh; Samsung Battery Pack 10200mAh.